
INTEGRATED POLICY of BASIS SERVICE MIDDLE EAST LLC

Quality • Protection of personal data • Sustainability (ESG) • Security

Basis Service Middle East LLC (hereinafter BSME) has clear objectives in terms of quality of the service provided, protection of personal data, sustainability and safety in the workplace, which it constantly pursues in the execution of its activities. This policy formalizes the principles, behavioral styles and objectives of BSME's corporate culture.

Quality of services provided

BSME wants to be a point of reference for customers for the activities they wish to outsource, offering qualified services quickly and effectively, the result of the experience gained in the field over many years of activity. Therefore, in pursuing objectives of development and improvement of competitive capacity aimed at satisfying the needs of the Customer, BSME will set up its activities in order to:

- operate taking into account the context in which it is inserted, the expectations of the interested parties and the influences that they could have on the proper conduct of operational activities;
- detect, in particular, the needs and expectations of Customers, analyzing them and converting them into service requirements;
- ensure and guarantee the distinctive values of Reliability, Continuity, Integrity, Equality and Privacy Protection that characterize the image and competitive positioning of the Company in the relevant market;
- meet the contractual requirements established with the Customer and the regulatory and mandatory requirements relating to the service provided;
- monitor costs, ensuring the quality of processes;
- Individually empower and motivate staff, encouraging their capacity development professional;
- promote the risk-based thinking approach within the organization, identifying, monitoring and evaluating the level of business risk, including information security loss, in order to take appropriate actions to reduce its impact;
- guarantee maximum collaboration with external subjects that become part of the organization's production process;
- share and focus on management, process and customer satisfaction objectives at every organizational level;
- continuously seek opportunities to increase productivity, efficiency and market shares, as well as implement continuous technological innovation in order to increase its competitiveness and improve the quality of services provided to the Customer;
- identify measurable objectives and verify their achievement through appropriate performance indicators;
- pursue the continuous improvement of the processes and effectiveness of the Quality Management System;

Protection of personal data

BSME is the Data Controller of the data it uses to carry out its business, it is therefore legally responsible for compliance with the obligations established by current legislation and therefore protects the confidentiality of personal data and guarantees the necessary protection from any event that may put them at risk of violation.

To this end, it has defined and identified internal processes, responsibilities, procedures to ensure full compliance with current requirements, in particular BSME acts in such a way as:

- protect the information and data managed as part of its activities from all internal or external threats, intentional or accidental;
- communicate and disseminate information to the outside world only for the proper conduct of company activities, which take place in compliance with the rules and regulations in force;
- ensure that all information security objectives are identified and that these meet business requirements;
- establish the company roles and responsibilities for the development and maintenance of the personal data protection system, providing sufficient resources for the planning, implementation, organization, control, audit, management and continuous improvement of the system itself;
- verify that the personal data protection system is integrated into all company processes, and that procedures and controls are developed effectively;
- approve and support all initiatives aimed at improving information security; ➤ activate programs for the dissemination of awareness and culture of safety of information.

Sustainability

BSME outlines strategies and objectives for managing sustainability risks, so-called ESG ("*Environmental, Social and Governance*"), i.e. relating to environmental, social and governance impact issues.

BSME is committed to constantly improving and monitoring its sustainability results, managing and mitigating the ESG risks to which it is exposed, defining the roles and responsibilities of the corporate bodies and structures involved in the management process of the same.

In particular, BSME follows specific guidelines for achieving what has been set and acts in line with the 2030 Agenda, or the United Nations Sustainable Development Goals ("*UN Sustainable Development Goals – SDGs*"), integrating this commitment into its business model, through the definition of improvement programs and concrete objectives, cooperating in this sense with stakeholders for the creation of shared value.

SOCIAL SPHERE

In particular BSME

- undertakes to promote and respect universally recognised human rights, as well as to support the elimination of all forms of forced and compulsory labour and the effective elimination of child labour within their respective spheres of influence (both in relation to internal conduct and in relation to its suppliers);
- implements, disseminates and monitors the correct functioning of a reporting system, even anonymous, of any problems related to failure to respect human rights and ethical values supported by the company, not admitting and combating any form of retaliation against the subjects who resort to reporting;
- ensures that "sustainability" is integrated into the company's strategy and processes, as it believes that the opportunities and well-being of customers and people who interact with BSME every day are necessary conditions for its ability to develop on the market and its sustainable success; to this end, BSME integrates in its strategic planning activity the reading of current and emerging social and environmental needs, in order to develop effective responses in this regard, considering it also fundamental for its development to adopt a

proactive approach to the knowledge, comparison and involvement of stakeholders, making transparency and non-financial reporting a characterizing objective of its action;

- protects workers and equal opportunities at every stage of the career path (from the selection, to the recruitment or start of collaboration, to the exit from the company), believing that its success is based on the professional qualities and moral integrity, as well as on the ability to collaborate and innovate of all its collaborators; is therefore committed to building and maintaining a work environment in which all these characteristics are present, and to supporting the development of everyone, regardless of gender, age, sexual orientation, personal condition, geographical origin and religious beliefs, so that people can find adequate conditions of respect and well-being;
- constantly strives to strengthen its ability to promote and enhance the expression of different talents, respecting all the diversities present in BSME, believing that the integration of different skills, abilities and attitudes contributes in a fundamental way to the collective activity of value creation;
- works to ensure optimal health and safety conditions at work, with an incremental approach compared to the provisions of the legislation in terms of prevention and health culture, as subsequently declined in this document;

ENVIRONMENTAL PROTECTION

BSME, in pursuit of a sustainable development project, designed to contribute to improving the quality of the environment around us, undertakes to:

- •comply with environmental legislation, all regulations, other subscribed requirements, applicable to its activities;
- •protect the environment, acting in such a way that its activities have the least impact on the environment, adopting the principles of environmental, terrestrial, marine and freshwater ecosystems and promoting the fight against climate change; to this end, BSME supports a preventive approach to environmental challenges, identifying and measuring the impact

its activities in the short, medium and long term, as well as adopting processes and technologies aimed at reducing the negative externalities characteristic of its activities (for example, climate-changing emissions such as greenhouse gases, exploitation of natural and energy resources, waste production, loss of biodiversity, degradation of terrestrial ecosystems, including forests, and marine and freshwater ecosystems);

- •promote training and information for workers on environmental protection, with particular regard to proper waste and consumption management;
- •inform, raise awareness and control suppliers regarding mandatory and improvement aspects in terms of environmental protection;
- •participate in initiatives that promote greater awareness and environmental responsibility among the production world, customers and external stakeholders in general; in particular, BSME considers climate change and energy exploitation one of the main risks deriving, directly or indirectly, from the exercise of its activities, for this reason it aims to adopt governance and management methods aimed at identifying, assessing, managing and reducing exposure to this risk, both in relation to its activities and its spheres of influence;
- •define its commitments for the reduction of climate-changing emissions, outlining a climate strategy approved and periodically reviewed by the Management;
- •ensure an effective monitoring system of the most significant environmental aspects related to its activities and the expectations of stakeholders;
- •pursue the continuous improvement of the environmental management system to increase its environmental performance, through the definition of measurable objectives and targets.

The Management is personally involved in the respect and implementation of the aforementioned principles, ensuring their dissemination within the company and availability to all interested parties, as well as periodically verifying the achievement of environmental objectives and targets; moreover, it undertakes to systematically verify that this Policy is supported by all its workers, starting with the department managers.

GOVERNANCE

In particular BSME:

- carries out specific training for employees in order to increase the culture of legality and prevent fraudulent behavior, episodes of corruption or conflict of interest, as well as money laundering, providing internal reporting procedures to the corporate bodies responsible for issues relating to the implementation and compliance with the Code of Ethics, irregularities or violations of rules and principles, whether actual or presumed;
- commits to implementing its due diligence in a structured manner to identify, prevent, mitigate and account for how it addresses actual and potential negative impacts on corporate governance, employment, human rights, the environment, corruption and customers, in its business, supply chain and other business relationships;
- defines and implements corporate strategies aimed at achieving Circular Economy objectives.

Health and Safety at Work

BSME has among its main objectives the protection of the safety and health of its employees and collaborators, both in the operating units of its relevance, and in the areas in which it carries out its services. To this end, it has established procedures that all employees involved must know and respect. The standards that the company pursues, supported by audit and control tools, allow **BSME** to better manage and monitor the achievement of defined objectives.

BSME is constantly committed to ensuring the highest degree of protection of the health and safety of employees and collaborators by providing suitable means and resources, and making use of the active collaboration of the figures belonging to the Prevention Service and Protection. The Management is responsible for the development of the program, objectives and procedures related to safety, their implementation, assistance and supervision of employees and employees involved in work processes.

In pursuing objectives of development and improvement of Safety procedures, also on the basis of the contents of the Risk Assessment Document (RAD), **BSME** sets its activities considering necessary:

- the communication of this Policy to all employees and persons working on behalf of the organization, making it available (publication on the company intranet in the Documentation section and on the organization's website);
- compliance with applicable laws, regulations, voluntary agreements and other legal requirements, in particular with regard to the environment, health and safety, minimizing sources of risk and impact on the environment;
- individual empowerment, involvement in programs, and motivation of employees and other people working on behalf of the organization;
- training and information for workers on environmental protection, prevention of risks at work, health and safety;
- information, awareness and monitoring of suppliers regarding mandatory and improvement aspects in the field of health and safety;
- the provision of adequate personal protective equipment and information on its correct use;

- the application of health protocols that monitor the health of workers;
- the correct and transparent management of internal and external communications with all interested parties, reports and complaints from outside, including through information, statistical surveys, handouts, verification questionnaires and periodic meetings on security;
- the continuous improvement of the processes and effectiveness of the programs with appropriate updates.

Finally, BSME has established an e-mail address (info_ehs@basisgroup.com) and made specific documentation, including this Policy, available to all employees on the company intranet, in order to:

- facilitate the evidence of any health, safety and environmental problems inherent in their work activities;
- provide constant information;
- improve the quality of life in the professional environment in which they are inserted.

The Integrated Policy signed by the highest position of Top Management and disclosed in a suitable manner to all employees and collaborators, as well as to interested parties, constitutes the commitment of the Company Basis Service Middle East LLC to achieve the objectives with a view to **Maximum Customer Satisfaction, for the** continuous improvement of the products / services provided, for the **Protection of Information**, with the utmost attention to the protection of the personal data of Employees, Customers, Suppliers and Collaborators, **the Promotion of Sustainability, at a social, environmental and governance level, as well as** the Protection of the Health and Safety of Workers **involved in the production process.**

This policy is periodically reviewed by Top Management in order to assess its continued effectiveness and suitability.

Abu Dhabi, 01/01/2023

Salvatore Rovella
CEO

